

EXHIBIT C

Scott A. Guelcher, Ph.D.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF KERN
CASE NO. S-1500-CV 279123 LHB

COLEEN M. PERRY,

PLAINTIFF

vs.

HUNG T. LUU, M.D.,
JOHNSON & JOHNSON, a New Jersey
Corporation; ETHICON, INC., a
New Jersey Corporation; and
DOES 1-60,

DEFENDANTS

The deposition of SCOTT A. GUELCHER, Ph.D.,
called by the Defendants for examination, taken
before Michelle E. Kerr, RPR, a Notary Public in and
for the Commonwealth of Kentucky, Daviess County, at
1719 West End Avenue, Nashville, Tennessee, on
December 18, 2014, commencing at 9:40 a.m.

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<p>1 disclose consulting relationships. When I</p> <p>2 submit a grant application, I'm required to</p> <p>3 disclose whether I have a significant</p> <p>4 financial interest. The NIH changed the</p> <p>5 rules in 2012. I disclose whether there is a</p> <p>6 significant financial interest, and then the</p> <p>7 dean's office works with me to figure out if</p> <p>8 there is a conflict, and if there is, how do</p> <p>9 we manage it.</p> <p>10 So there is no fixed set procedure. It's</p> <p>11 very much handled on a case-by-case basis.</p> <p>12 And disclosures are continuously updated as</p> <p>13 new information becomes available.</p> <p>14 Q How is significant financial interest</p> <p>15 defined?</p> <p>16 A The NIH defines a significant financial</p> <p>17 interest as \$5,000 a year. That's one way to</p> <p>18 define it. Another is equity. Strike that.</p> <p>19 The NIH defines it as \$5,000 or greater.</p> <p>20 Financial interest, that could be cash. That</p> <p>21 could be equity. That could be any form of</p> <p>22 compensation, but the threshold is \$5,000.</p> <p>23 Q Have all monies you receive in your role as</p> <p>24 an expert in the transvaginal mesh litigation</p> <p>25 for the calendar year 2014 been paid to you</p>	<p>1 independent role now as an expert and</p> <p>2 billing as an expert will have on your</p> <p>3 ability to work or run a lab that has</p> <p>4 federally-funded research?</p> <p>5 A Yes, I have.</p> <p>6 Q And what affect, if any, have you learned</p> <p>7 about that?</p> <p>8 A I'm contemplating updating my disclosure.</p> <p>9 And -- well, I will leave it at that.</p> <p>10 Q Have you had any discussions with anyone at</p> <p>11 Vanderbilt about ways you could work around</p> <p>12 the ramifications that the receipt of federal</p> <p>13 funding has on your role as an expert?</p> <p>14 MR. KUNTZ: Objection.</p> <p>15 A I don't like this word work around. That's</p> <p>16 not what we do. We identify conflicts. We</p> <p>17 disclose information to the dean's office.</p> <p>18 We work with the dean's office to identify</p> <p>19 conflicts. If conflicts are identified, we</p> <p>20 work with the dean's office and the general</p> <p>21 counsel's office to identify and manage a</p> <p>22 plan, which is then approved -- approved by</p> <p>23 the conflict of interest committee.</p> <p>24 I've been through this process multiple</p> <p>25 times. I've had management plans. I've been</p>
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<p>1 through Dr. Dunn's company?</p> <p>2 A The money I have received has all been</p> <p>3 received through Dr. Dunn's company, that's</p> <p>4 right, yes. The money I received, yes.</p> <p>5 Q Does anyone at Vanderbilt know the scope of</p> <p>6 Dr. Dunn's company?</p> <p>7 A I can't speak to Dr. Dunn's company. I don't</p> <p>8 know the details of his arrangement with the</p> <p>9 university. I just don't. He has a</p> <p>10 different type of appointment than I have.</p> <p>11 He doesn't do federally-funded research.</p> <p>12 That's what I know. I don't know the details</p> <p>13 of his arrangement with Vanderbilt.</p> <p>14 Q Is Dr. Dunn in a position of authority over</p> <p>15 you at Vanderbilt?</p> <p>16 A No.</p> <p>17 Q If Dr. Dunn wanted to do federally-funded</p> <p>18 research, would he be able to in light of his</p> <p>19 activities and the amount of money his</p> <p>20 company bills for expert work in the</p> <p>21 transvaginal mesh litigation?</p> <p>22 A I can't speak to that. I don't know how much</p> <p>23 his company bills or makes. I don't know</p> <p>24 that information.</p> <p>25 Q Have you investigated what affect your</p>	<p>1 disclosing conflicts to Vanderbilt since I</p> <p>2 started there. There is a very standard and</p> <p>3 routine process. Faculty are allowed and</p> <p>4 encouraged to participate in activities</p> <p>5 outside of Vanderbilt. I do this in the</p> <p>6 course of my research with licensing,</p> <p>7 start-up companies. This is routine.</p> <p>8 There is a process and a procedure. And</p> <p>9 we're not working around anything. We're</p> <p>10 trying to find a way to work within the</p> <p>11 framework of the federal regulations and</p> <p>12 university policy. It's very standard for</p> <p>13 universities.</p> <p>14 BY MR. SNELL:</p> <p>15 Q Have you told Vanderbilt how much money you</p> <p>16 have earned as an expert in the transvaginal</p> <p>17 mesh litigation?</p> <p>18 A You have asked me this before. And I said we</p> <p>19 are not required in the course of our work to</p> <p>20 disclose that. If I believe that I see a</p> <p>21 conflict between my research and the</p> <p>22 consulting, then I will disclose that and the</p> <p>23 university will -- we will have those</p> <p>24 discussions, but we are not required to</p> <p>25 disclose this information for consulting</p>

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<p>1 work.</p> <p>2 Q So the answer to my question is, no, you have</p> <p>3 not disclosed that to Vanderbilt, correct?</p> <p>4 A I'm not required -- strike that.</p> <p>5 Q My question is simple. Have you disclosed to</p> <p>6 Vanderbilt --</p> <p>7 A And I believe I have answered your question.</p> <p>8 Q I think you are telling me about what you're</p> <p>9 required to do.</p> <p>10 I'm asking you, have you, Dr. Guelcher,</p> <p>11 disclosed to Vanderbilt the monies, the</p> <p>12 amount of monies you have earned as a</p> <p>13 plaintiff's expert in transvaginal mesh</p> <p>14 litigation?</p> <p>15 MR. KUNTZ: Object. Answer it.</p> <p>16 BY MR. SNELL:</p> <p>17 Q It's a yes or no answer.</p> <p>18 A No, I've not disclosed, but I'm not --</p> <p>19 Q Have you informed your dean of your current</p> <p>20 intention to bill as an independent</p> <p>21 consultant to attorneys in the transvaginal</p> <p>22 mesh litigation?</p> <p>23 A Why would I inform the dean of this? I've</p> <p>24 not informed the dean. I have to inform the</p> <p>25 dean when I believe there is a conflict. And</p>	<p>1 if and when I submit a grant application,</p> <p>2 that would create the conflict, but that's</p> <p>3 tied to INH funding. That's not -- why I'm</p> <p>4 not required to disclose it unless there is a</p> <p>5 conflict of the federally-funded research</p> <p>6 project.</p> <p>7 Q Have you performed any testing on Ms. Perry's</p> <p>8 mesh?</p> <p>9 A I have not.</p> <p>10 Q Have you looked at Ms. Perry's mesh under a</p> <p>11 scanning electron microscope?</p> <p>12 A I have not.</p> <p>13 Q What are all of the different tests, methods</p> <p>14 that one can do to try to determine whether</p> <p>15 there is degradation of polypropylene?</p> <p>16 A So degradation of polypropylene could be</p> <p>17 assessed by SEM imaging. That's typically</p> <p>18 how we assess it.</p> <p>19 Q FTIR --</p> <p>20 A FTIR -- I'm sorry.</p> <p>21 Q FTIR is a way that one can go about trying to</p> <p>22 assess whether there is degradation of</p> <p>23 polypropylene, correct?</p> <p>24 A No, that's not why we use FTIR. We use FTIR</p> <p>25 to assess for oxidation, chemical changes in</p>
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<p>1 if and when I make that assessment, I will</p> <p>2 update my disclosure. But according to</p> <p>3 Vanderbilt policy, we're not required to do</p> <p>4 those things.</p> <p>5 Q Well, if you spent approximately 20 hours at</p> <p>6 \$285 an hour thus far, that is over \$5,000.</p> <p>7 Are you telling me that if you have a greater</p> <p>8 than \$5,000 interest in your role as an</p> <p>9 independent billing consultant to</p> <p>10 transvaginal mesh litigation, you do not need</p> <p>11 to tell that to the dean?</p> <p>12 MR. KUNTZ: Objection.</p> <p>13 A No, you are misinterpreting and</p> <p>14 misunderstanding what I have said. The</p> <p>15 question is, whether the proposed research,</p> <p>16 when I submit a grant application, I submit</p> <p>17 an application to the NIH for federal</p> <p>18 funding. I have to answer the question, do</p> <p>19 you have a significant financial interest in</p> <p>20 the outcome of this federally-funded project.</p> <p>21 Significant financial interest is defined</p> <p>22 as more than \$5,000. But at this point in</p> <p>23 time and in the past there -- at this time,</p> <p>24 there is no overlap between the consulting</p> <p>25 work and the federally-funded research. So</p>	<p>1 the polypropylene. That can be assessed by</p> <p>2 the FTIR.</p> <p>3 Q And when you look for oxidation via FTIR,</p> <p>4 what you are looking for is to see if there</p> <p>5 is a potential that would lead to</p> <p>6 degradation; is that correct?</p> <p>7 A No. We are looking at oxidation to answer</p> <p>8 the specific question of is the surface</p> <p>9 oxidizing, is it chemically changing. And we</p> <p>10 can see that by peaks in the FTIR spectra</p> <p>11 that are not there in the normal</p> <p>12 polypropylene, but do appear for oxidized</p> <p>13 polypropylene.</p> <p>14 Q Now, as I understand it, Dr. Dunn, in prior</p> <p>15 work did FTIR in connection with assessing</p> <p>16 the question of is there degradation of</p> <p>17 polypropylene?</p> <p>18 A And why is that -- I don't know what you're</p> <p>19 referring to.</p> <p>20 Q I recall in your Huskey testimony, in your</p> <p>21 deposition, you testified that all of the</p> <p>22 testing done was done by Dr. Dunn. And I</p> <p>23 believe you identified FTIR, XPS, and I don't</p> <p>24 know if there were others.</p> <p>25 A I don't remember the testing that Dr. Dunn</p>

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<p>1 did for the Huskey trial. I do believe we</p> <p>2 did FTIR. I don't remember the others, but</p> <p>3 oxidation and degradation are related, but</p> <p>4 they're -- in terms of -- and there may be</p> <p>5 times that people use the word degradation to</p> <p>6 consider all of these effects, but I'm</p> <p>7 speaking specifically about oxidation as a</p> <p>8 chemical process, and degradation as a</p> <p>9 physical one, and they're assessed by</p> <p>10 different techniques.</p> <p>11 And I don't remember all of the testing</p> <p>12 that Dr. Dunn did for the Huskey trial. I</p> <p>13 don't remember that.</p> <p>14 Q So if one does FTIR testing and sees that the</p> <p>15 surface is oxidized, that does not</p> <p>16 necessarily mean that the material is</p> <p>17 degraded, correct?</p> <p>18 A There are different tests to assess -- they</p> <p>19 could be degraded, but we would assess</p> <p>20 degradation using a different technique than</p> <p>21 FTIR. FTIR, as I said, is for chemical</p> <p>22 oxidation, which is a chemical change. There</p> <p>23 may be degradation, but we would confirm that</p> <p>24 with a technique such as SEM.</p> <p>25 Q So if a scientist has a positive FTIR finding</p>	<p>1 BY MR. SNELL:</p> <p>2 Q The fact that it's a strong indicator,</p> <p>3 though, that in and of itself means that</p> <p>4 there is some possibility that you will not</p> <p>5 see physical degradation, and there is a</p> <p>6 possibility as well that you will see it,</p> <p>7 physical degradation, if you look at SEM,</p> <p>8 correct?</p> <p>9 MR. KUNTZ: Objection.</p> <p>10 A Again, the literature tells us that you would</p> <p>11 expect degradation. Is it -- unless you</p> <p>12 actually see it, you can't prove -- you can't</p> <p>13 guarantee that it's there, but you would</p> <p>14 certainly expect it. It's within a</p> <p>15 reasonable degree of scientific certainty to</p> <p>16 expect that you would have degradation in</p> <p>17 time if that surface is being oxidized.</p> <p>18 There are numerous papers that teach</p> <p>19 about this, about polymers in general,</p> <p>20 polymers that are susceptible to oxidative</p> <p>21 attack showed signs of physical degradation.</p> <p>22 This was all worked out a number of years</p> <p>23 ago.</p> <p>24 MR. SNELL: Move to strike.</p> <p>25 BY MR. SNELL:</p>
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<p>1 for oxidation on the surface, he would then</p> <p>2 need to confirm that with SEM in order to</p> <p>3 reasonably say with scientific certainty that</p> <p>4 there was degradation?</p> <p>5 MR. KUNTZ: Objection.</p> <p>6 A I would say that the literature teaches us</p> <p>7 that these processes are related, oxidation.</p> <p>8 Chemical oxidation leads to physical</p> <p>9 degradation. And so if I see evidence of</p> <p>10 oxidation, I would expect to see physical</p> <p>11 degradation in time. To visibly see that</p> <p>12 physical degradation, I would do the</p> <p>13 technique such as SEM.</p> <p>14 But if I see oxidation, I would certainly</p> <p>15 expect based on published literature findings</p> <p>16 that there would be degradation in time to</p> <p>17 some extent.</p> <p>18 BY MR. SNELL:</p> <p>19 Q Well, if you see chemical oxidation, it is</p> <p>20 not a guarantee that physical degradation has</p> <p>21 taken place, correct?</p> <p>22 MR. KUNTZ: Objection.</p> <p>23 A I think I just answered that. It's a strong</p> <p>24 indicator that there is also physical</p> <p>25 degradation.</p>	<p>1 Q My question is this. It's straight forward.</p> <p>2 The fact that you see chemical oxidation,</p> <p>3 that does not mean that you would also see</p> <p>4 under SEM analysis physical degradation if</p> <p>5 you were to look at that particular time; is</p> <p>6 that correct?</p> <p>7 MR. KUNTZ: Objection. Asked</p> <p>8 and answered. Calls for speculation, and is</p> <p>9 an incomplete hypothetical. But go ahead.</p> <p>10 A This is a speculative question. What I'm</p> <p>11 saying is, if there is oxidative changes, the</p> <p>12 body of literature teaches within a</p> <p>13 reasonable degree of scientific certainty</p> <p>14 that there will be at some time physical</p> <p>15 degradation. That's what the literature is</p> <p>16 teaching us.</p> <p>17 BY MR. SNELL:</p> <p>18 Q You keep saying at some time there will be</p> <p>19 physical degradation. At what time will</p> <p>20 there be physical degradation?</p> <p>21 A As I've said in my previous testimony, it's</p> <p>22 unpredictable. And that's a problem for the</p> <p>23 design of the device, because it's subject to</p> <p>24 changes that can happen that you can't</p> <p>25 predict the timing of these changes and what</p>

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<p>1 the implications will be.</p> <p>2 Q Do you have an opinion as to what is the</p> <p>3 earliest point in time where there can be</p> <p>4 physical degradation of Ethicon's Prolene</p> <p>5 polypropylene used in TVT Abbrevio?</p> <p>6 A Again, that's a speculative question. I</p> <p>7 believe that upon implantation, the device</p> <p>8 will be colonized by adherent inflammatory</p> <p>9 cells. This is well-known in the literature,</p> <p>10 the foreign body reaction. Those cells will</p> <p>11 secrete species that oxidize it. The timing</p> <p>12 of all these events can depend on a number of</p> <p>13 factors, the nature of the inflammatory</p> <p>14 response where it's implanted, the mechanical</p> <p>15 stresses in the environment, whether there is</p> <p>16 a bacterial infection.</p> <p>17 The timing can be highly variable. It</p> <p>18 can happen early or it can happen late. The</p> <p>19 point is that it's unpredictable. That's</p> <p>20 what I've been saying.</p> <p>21 Q Well, I would like to know what does the</p> <p>22 literature teach you about the earliest point</p> <p>23 in time when you can say there is physical</p> <p>24 degradation of the Prolene polypropylene</p> <p>25 mesh?</p>	<p>1 time periods of three months and later.</p> <p>2 That's what Clave reported.</p> <p>3 Q And you have a list of materials here today.</p> <p>4 Where in Clave does it say that --</p> <p>5 A I would have to see the paper. I know that</p> <p>6 in Clave, it says that -- he notes that</p> <p>7 explants -- I would have to see it to give a</p> <p>8 precise answer. The number I remember is</p> <p>9 three months.</p> <p>10 (Deposition Exhibit No. 1 was</p> <p>11 marked for identification.)</p> <p>12 BY MR. SNELL:</p> <p>13 Q Doctor, I've handed you Exhibit No. 1. Is</p> <p>14 that the Clave paper you were referring to,</p> <p>15 sir?</p> <p>16 A That is correct.</p> <p>17 Q So can you show me where in Clave it states</p> <p>18 that physical degradation occurred in the</p> <p>19 Prolene polypropylene mesh at a certain time</p> <p>20 period?</p> <p>21 A I'm looking for that. So on Page 264 of</p> <p>22 Clave, it states degradation was observed</p> <p>23 only in samples implanted for at least three</p> <p>24 months.</p> <p>25 Q That is a general statement about the overall</p>
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<p>1 I don't want to rehash everything you</p> <p>2 talked about in Huskey. I know you talked</p> <p>3 about what was seen in two years and I</p> <p>4 believe five or seven years in a dog study</p> <p>5 and things like that. So with all of those</p> <p>6 principles that you've already testified</p> <p>7 about, let me just back up and re-ask it.</p> <p>8 A Okay.</p> <p>9 MR. KUNTZ: Objection.</p> <p>10 BY MR. SNELL:</p> <p>11 Q What is the earliest point in time that you</p> <p>12 can say that there is physical degradation of</p> <p>13 the Prolene polypropylene mesh?</p> <p>14 A I just can't answer that question. There are</p> <p>15 too many factors that can influence it. To</p> <p>16 say -- again, it's too speculative. It</p> <p>17 depends on many factors in addition to the</p> <p>18 chemical oxidation.</p> <p>19 Q Based on all of the literature that you saw,</p> <p>20 what was the earliest time reported that</p> <p>21 there was physical degradation of the Prolene</p> <p>22 polypropylene mesh?</p> <p>23 A For Prolene polypropylene, I can say from the</p> <p>24 Clave paper and the explants that were</p> <p>25 studied in Clave, he recorded degradation in</p>	<p>1 cohort of explants, correct?</p> <p>2 A That's my understanding.</p> <p>3 Q That statement is not necessarily particular</p> <p>4 to a Prolene polypropylene mesh implant,</p> <p>5 correct?</p> <p>6 A There could have been Prolene implants in</p> <p>7 this study. That statement doesn't specify</p> <p>8 whether that applies to Prolene or not.</p> <p>9 Q So my question is, can you point to any</p> <p>10 literature which informs you of the earliest</p> <p>11 time which the Prolene polypropylene mesh</p> <p>12 physically degrades?</p> <p>13 MR. KUNTZ: Objection.</p> <p>14 A I don't know of this -- you mean in vivo of</p> <p>15 patients?</p> <p>16 BY MR. SNELL:</p> <p>17 Q Yes, sir.</p> <p>18 A I don't know of a study that has specifically</p> <p>19 reported that.</p> <p>20 Q In the dog study -- and you're still relying</p> <p>21 on the dog study as well with the Prolene</p> <p>22 sutures?</p> <p>23 A The dog study, it's in my reliance materials,</p> <p>24 so it's part of the documents I have</p> <p>25 reviewed.</p>

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<p>1 Q At what point in time was physical 2 degradation observed in that study? 3 A I can't remember. I would have to look at 4 the document. 5 Q Okay. At a break, I would like for you to 6 look at that document. And I will have the 7 same question for the vascular graft Prolene 8 suture study, what is the earliest point in 9 that study if at any point in time it showed 10 physical degradation? 11 A Again, I would have to look at it. I don't 12 remember that level of detail. 13 Q Am I correct that although Clave reports 14 there were 100 explanted samples, a smaller 15 number were actually analyzed? 16 A What do you mean analyzed? I'm not sure what 17 you mean. 18 Q Let me ask you, how many explants were 19 analyzed in the Clave study? 20 A I would have to look at it. There were 100 21 explants. I'm still not sure what you're 22 asking, though. I mean, there were 100 23 explants. 24 Q How many of those 100 explants were actually 25 analyzed?</p>	<p>1 BY MR. SNELL: 2 Q My question was not what is he saying. My 3 question was to you, what limitations does 4 that place upon what one can draw from Clave 5 due to the fact that only 32 out of 100 6 explants were submitted for chemical testing? 7 A I don't see how it limits the finding that he 8 sees changes. That's what he is reporting, 9 whether he sees it in 32 or 50, whether he 10 looked at 32 or 100. I mean, you may be 11 implying that he was cherry-picking data, but 12 I have no reason to believe that. This is a 13 peer-reviewed journal. 14 I mean, he studied what he could study, 15 but it doesn't limit the finding that these 16 changes happened. Whether he did 32 or 100, 17 he still saw changes. So I don't understand 18 how that limits that finding. 19 Q Well, he had 100 explants, and he only 20 subjected 32 to chemical analysis. We can 21 agree to that, right? 22 A That's what he states. But beyond that, I 23 don't -- 24 Q And you don't know the methodology by which 25 he selected the particular 32 for chemical</p>
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<p>1 A Well, I think it depends on the method, so -- 2 they did a chemical analysis on 32 explants. 3 It doesn't necessarily say in the methods. 4 Q Why did Clave do less than one-third of the 5 overall sample size for chemical analysis? 6 A I don't know. I would have to look at this 7 to -- 8 Q By only analyzing 32 out of 100 explants for 9 a chemical analysis, what limitations does 10 that place upon the interpretation one can 11 draw from the Clave paper? 12 A Well, what I believe Clave is saying is 13 consistent with my opinions, that these 14 events can happen and can lead to problems 15 and complications. He's not saying it 16 happens all the time in every mesh at this 17 particular time. 18 He is saying that these meshes change, 19 which is consistent, which is my opinion in 20 this case, that the meshes change, and that 21 introduces an extra level of risk because 22 these changes make the meshes -- make their 23 behavior unpredictable. That is what he is 24 saying. 25 MR. SNELL: Move to strike.</p>	<p>1 analysis, correct? 2 A Well, let me read it. I need to read this, 3 because I'm not quite following where you are 4 going with this. 5 Okay. So he says -- I mean, he explains 6 himself. The samples were divided into four 7 groups. Because of the small sample size and 8 physical condition of the explanted 9 materials, extensive and complete chemical 10 analysis was difficult, which I think most 11 would agree is true. And he has several 12 groups listed here, four groups. 13 One of the fourth group is a control with 14 pristine implants, which he has a number of 15 pristine implants listed. So he grouped one 16 as degraded polypropylene that he analyzed by 17 SEM. 18 Group two is a group of nondegraded 19 explants, which again looks like 20 polypropylene mesh. And then the fourth 21 group of PET explants. That's what he says 22 he did. And he says it was difficult. He 23 probably didn't have much material to work 24 with, but these are explants. This isn't a 25 clinical trial. These are explants, so that</p>

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<p>1 studies or documents or data that you can</p> <p>2 review independently of Dr. Dunn, correct?</p> <p>3 A Yes, that's correct.</p> <p>4 MR. SNELL: Objection. You've</p> <p>5 got to give me a chance to object. Leading,</p> <p>6 compound. Go ahead.</p> <p>7 BY MR. KUNTZ:</p> <p>8 Q You repeatedly in your practice are going to</p> <p>9 have expertise reviewing those types of</p> <p>10 studies, SEM, FTIR, and XPS?</p> <p>11 MR. SNELL: Objection. Leading</p> <p>12 compound. Go ahead.</p> <p>13 A Yes, I do.</p> <p>14 Q And if Ethicon did those studies or had those</p> <p>15 types of documents, you could review those</p> <p>16 independently, correct?</p> <p>17 MR. SNELL: Same objections.</p> <p>18 A Yes, I could.</p> <p>19 Q The last question I have. Is there any</p> <p>20 peer-reviewed article that you're aware of</p> <p>21 that shows or supports the notion that</p> <p>22 macrophages in foreign body giant cells can</p> <p>23 be deactivated?</p> <p>24 A I'm not aware of such an article.</p> <p>25 MR. KUNTZ: Okay. No more</p>	<p>1 of the response, part of the answer.</p> <p>2 I'm done. Thank you.</p> <p>3 (Deposition was adjourned at 5:50</p> <p>4 p.m.)</p> <p>5 * * *</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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<p>1 questions.</p> <p>2 REDIRECT EXAMINATION</p> <p>3 BY MR. SNELL:</p> <p>4 Q Are you aware of any book chapters, any</p> <p>5 articles in the peer-reviewed literature that</p> <p>6 says that macrophages can indeed be</p> <p>7 deactivated?</p> <p>8 A I'm not aware of those articles. That's what</p> <p>9 I said earlier.</p> <p>10 Q But you have seen it in the literature or in</p> <p>11 books that macrophages can be quiescent?</p> <p>12 A That's not what I said. I'm familiar with</p> <p>13 this idea of reprogramming macrophages, but I</p> <p>14 am not familiar with any studies that have</p> <p>15 shown that this has been done or under what</p> <p>16 conditions it happens. I mean, I'm familiar</p> <p>17 with the idea. I'm just not familiar with</p> <p>18 such a study is what I'm saying.</p> <p>19 Q You're not familiar with such a study that</p> <p>20 shows that macrophages are activated</p> <p>21 longitudinally every day for years and years?</p> <p>22 A No one has proven that, but Anderson teaches</p> <p>23 they're activated when they adhere. That's</p> <p>24 what it says.</p> <p>25 MR. SNELL: Move to strike part</p>	<p>1 STATE OF KENTUCKY)</p> <p>2)</p> <p>3 COUNTY OF DAVIESS)</p> <p>4</p> <p>5 I, MICHELLE E. KERR, A NOTARY PUBLIC AT LARGE IN</p> <p>6 AND FOR THE COMMONWEALTH OF KENTUCKY, DO HEREBY</p> <p>7 CERTIFY:</p> <p>8 THAT SAID DEPOSITION WAS TAKEN STENOGRAPHICALLY</p> <p>9 AND ELECTRONICALLY BY ME AND THAT THE TYPEWRITTEN</p> <p>10 TRANSCRIPT ABOVE IS A TRUE RECORD OF THE</p> <p>11 TESTIMONY GIVEN; THAT I ALSO RECORDED AND</p> <p>12 TRANSCRIBED ANY AND ALL OBJECTIONS MADE BY COUNSEL</p> <p>13 AND THE REASONS THEREFORE; AND THAT I AM NOT A</p> <p>14 RELATIVE OR EMPLOYEE OR ATTORNEY OR COUNSEL OF ANY</p> <p>15 OF THE PARTIES, NOR A RELATIVE OR EMPLOYEE OF SUCH</p> <p>16 ATTORNEY OR COUNSEL, NOR AM I FINANCIALLY INTERESTED</p> <p>17 IN THIS ACTION.</p> <p>18</p> <p>19</p> <p>20 IN WITNESS WHEREOF, I HAVE HEREUNTO SET MY HAND</p> <p>21 AND AFFIXED MY NOTARIAL SEAL ON THIS ____ DAY OF</p> <p>22 DECEMBER, 2014.</p> <p>23</p> <p>24 MICHELLE E. KERR, NOTARY PUBLIC</p> <p>25 My Commission Expires:</p> <p>March 21, 2017</p> <p>March 21, 2017</p>

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